

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CASE No. 1:15-bk-04869-MDF  
EDGE PENNSYLVANIA, LLC :  
d/b/a Edge Rubber : CHAPTER 11  
f/k/a Blackacre Properties, LLC :  
Debtor :

**DEBTOR'S MOTION FOR EMERGENCY AND EXPEDITED HEARING  
REGARDING: (i) DEBTOR'S MOTION FOR APPROVAL TO  
UTILIZE CASH COLLATERAL; (ii) DEBTOR'S MOTION  
FOR ENTRY OF INTERIM AND FINAL ORDER PROVIDING FOR ADEQUATE  
ASSURANCE OF PAYMENT FOR FUTURE UTILITY SERVICES; AND (iii)  
DEBTOR'S MOTION FOR APPROVAL TO PAY PRE-PETITION PAYROLL**

The Debtor's Motion for Emergency and Expedited Hearing regarding (i) the Debtor's Motion for Approval to Utilize Cash Collateral (the "Cash Collateral Motion"); (ii) Motion for Entry of Interim and Final Order Providing for Adequate Assurance of Payment for Future Utility Services (the "Utilities Motion"); and (iii) Motion for Approval to Pay Pre-Petition Payroll (the "Payroll Motion"), is as follows:

1. On November 12, 2015, the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the "Code"). As a result thereof, the Debtor has been appointed as a Debtor-in-Possession and operates its business and manages its assets.

2. The Debtor is a Pennsylvania limited liability company operating in Franklin County, Pennsylvania, and is engaged primarily in the collection, transportation and processing of tire derived non-hazardous waste.

3. In order to continue its business, the Debtor has a need to utilize its accounts receivables, inventory, and cash and pay its expenses of operation. As a result, the Debtor has filed the Cash Collateral Motion.

4. In order to allow the Debtor to continue to operate, the Debtor requests that the hearing on the Cash Collateral Motion be held on an expedited and emergency basis. A true and correct copy of the Cash Collateral Motion is attached hereto as Exhibit "A".

5. The Debtor operates a tire processing business. The operations will be harmed by the termination of utility services.

6. Thus, the Debtor has filed the Utilities Motion. It is also requested that the Utilities Motion be heard on an emergency and expedited basis so that the Debtor does not lose utility services. A true and correct copy of the Utilities Motion is attached hereto as Exhibit "B".

7. The Debtor has employees which it needs to utilize in order to continue to provide services to its customers and generate receivables. As a result, the Debtor has filed the Payroll Motion. A true and correct copy of the Payroll Motion is attached hereto as Exhibit "C." It is also requested that the Payroll Motion be heard on an emergency and expedited basis so that the Debtor does not lose its employees.

8. For the above reasons, the Debtor requests that the Court schedule a hearing on the Cash Collateral Motion, the Utilities Motion, and the Payroll Motion at the earliest possible moment.

**WHEREFORE**, the Debtor respectfully requests that this Honorable Court schedule a hearing on the Debtor's Motion for Approval to Utilize Cash Collateral, the Debtor's Motion for an Interim and Final Order providing for Adequate Assurance of Payment of Future Utility Services, and the Debtor's Motion for Approval to Pay Pre-Petition Payroll, at the earliest possible moment.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF  
& WARSHAWSKY, P.C.

By: /s/ Robert E. Chernicoff  
Robert E. Chernicoff, Esquire  
Attorney I.D. No. 23380  
2320 North Second Street  
P. O. Box 60457  
Harrisburg, PA 17106-0457  
(717) 238-6570

Date: November 13, 2015